

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Erica Heckle,

Plaintiff,

v.

Matrix Absence Management, Inc.,

Defendant.

Case No. 7:21-cv-1463 VB

SECOND DECLARATION OF MOLLY A. ELKIN

I, Molly A. Elkin, do hereby declare under penalty of perjury, that the following representations contained in this Declaration are true and correct to the best of my personal knowledge:

1. I am a named partner at McGillivray Steele Elkin LLP, and I serve as co-lead counsel for Plaintiff in this action. I also serve as Class Counsel. *See* Dkt. 72.

2. The attorneys at McGillivray Steele Elkin LLP have extensive experience representing employees and unions, and we specialize in wage and hour cases. A detailed description of my qualifications and experience is set forth more fully in my March 22, 2022, Declaration (Dkt. 44).

3. A detailed description of the qualifications and experience of my co-Class Counsel Travis Hedgpeth and Jack Siegel are set forth in their March 21, 2022, Declarations (Dkts. 43, 45).

4. Attached to this declaration as **Exhibit A** is a summary listing of the hours worked and associated charges for that work performed by me and others in my law firm in this lawsuit.

The rates used in Exhibit A are: \$620 an hour for senior partners, \$370-\$420 an hour for senior

associates, and \$205-\$210 for paralegals. The summary was made by extracting the data from Class Counsel's contemporaneous billing records.

5. Attorney Gregory McGillivary is a named partner at McGillivary Steele Elkin LLP who has represented employees and unions for over 35 years. In addition to representing unions in traditional labor relations on an ongoing basis, Mr. McGillivary has successfully litigated FLSA claims on behalf of over fifty thousand workers throughout the country, collecting hundreds of millions of dollars from FLSA violators in all employment sectors including private, municipal, and federal. From 1997-2003, Mr. McGillivary was the Union Chair of the ABA's Federal Labor Standards Legislation Committee. Additionally, Mr. McGillivary is a senior editor of BNA's publication of a treatise on the FLSA entitled "The Fair Labor Standards Act," and participates in preparing the annual supplements to that treatise. He is also the Editor in Chief of BNA's "Wage and Hour Laws: A State by State Survey." In November 2017, he was inducted into the College of Labor and Employment Lawyers as a Fellow. Mr. McGillivary spent a total of 1.8 hours on this matter.

6. Sarah M. Block has been an associate attorney with the firm since June 2015, and she represents unions and employees and provides general legal advice on labor relations and employment issues. In this case, she reviewed documents, conducted telephone conferences with plaintiff, took depositions on multiple FRCP 30(b)(6) topics, assisted in drafting numerous motions and responses, including Plaintiff's successful motion for class certification, and the motions for preliminary and final approval of the settlement, and mediation papers. Prior to joining the firm, Ms. Block worked as an Associate for Guerrieri, Clayman, Bartos & Parcelli, P.C., primarily representing transportation unions in nationwide litigation and arbitration. Ms. Block graduated from The George Washington University Law School in 2014, where she served as the

Senior Articles Editor of The Federal Circuit Bar Journal. She also holds a B.A. in History (with honors) and Spanish, *summa cum laude*, from Bucknell University. She spent a total of 112.6 hours on this case.

7. Associate Hillary D. LeBeau worked at McGillivray Steele Elkin LLP from August 2016 to October 2021 as an Associate. She represented unions and employees in a variety of cases and provided general legal advice on labor relations and employment issues. Her litigation focus while at the firm was in the FLSA and Wage and Hour arena. Ms. LeBeau graduated from Cornell Law School in 2016. She was the 2016 recipient of the Stanley E. Gould Prize for Public Interest Law. She graduated from DePaul University with honors in 2011, with a degree in American Studies. Additionally, Ms. LeBeau served as a contributing editor for the BNA treatise, “THE FAIR LABOR STANDARDS ACT” and served as a chapter author for BNA’s WAGE AND HOUR LAWS: A STATE BY STATE SURVEY (3d ed. 2016). She is a member in good standing of the State Bars of the District of Columbia and New York and is a member in good standing of the bars of the Sixth Circuit Court of Appeals and United States District Courts for the District of Columbia, Southern District of New York, Eastern District of New York and Court of Federal Claims. Ms. LeBeau spent a total of 62.1 hours in the litigation of this matter.

8. Keith Nickerson is the Litigation Director at McGillivray Steele Elkin LLP. He assisted in reviewing and summarizing pay and hours work data in this matter and working with Plaintiff’s expert to prepare damages models for the individual plaintiff and the settlement class members for both mediations, participating in meetings with counsel about the damages models and data, participating in mediation, and revising the damages models during the protracted negotiations. He has a Master’s in Business Administration from the University of Maryland, which he received in 2001, and he is a 1989 graduate of the University of Rochester. From July

5, 1989 to July 5, 1999, he was a paralegal with the firm, and from October 1, 2001 to October 1, 2002, a consultant. Since July 2004, he has been the Litigation Director. In large wage and hour actions he is responsible for conducting data analysis related to pay issues and preparing spreadsheets and reports on the results of his analysis. In addition, he supervises the litigation paralegals and off-site consultants who may assist him with these data analysis projects. Over the course of over 25 years with McGillivray Steele Elkin LLP, he has prepared calculation spreadsheets and damages models showing amounts owed in over 400 multi-plaintiff and multi-grievant cases involving wage and hour claims and he has testified about such calculations in multiple cases. Mr. Nickerson spent 52 hours on this matter.

9. Kathleen Dacruz is a paralegal for McGillivray Steele Elkin LLP. She performed traditional paralegal work in this case, including preparing exhibits for filing; preparing *pro hac vice* motions; and preparing pleadings for filing. She spent a total of 9.7 hours on this case.

10. The substantial experience and the educational background of my Co-Class Counsel are described in the declarations that Co-Class Counsel submitted in support of Plaintiff's Motion for Rule 23 Class Certification. (Dkt. 43, Hedgpeth Declaration; Dkt 45, Siegel Declaration).

11. Attached to this declaration as **Exhibit B** is a listing of the fees and expenses incurred by the Hedgpeth Law Firm. **Exhibit C** is a listing of the fees and expenses incurred by Siegel Law Group PLLC. These firms used the same rates listed in paragraph 4 above to compile the summaries, and the hours listed in the summaries were recorded in Co-Counsel's billing records on a contemporaneous basis.

12. Class Counsel undertook this case on a contingency fee basis. As such, during the past two and one-half years of litigating this case, Class Counsel have not been paid for any of the

work that they have performed. This uncompensated work has been substantial, and it achieved excellent results. The unpaid work, to date, includes: (1) interviewing witnesses and selecting a class representative; (2) preparing and filing the complaint; (3) engaging in mandatory mediation; (4) engaging in extensive written discovery; (5) taking and defending depositions; (6) briefing the class action certification motion; (7) analyzing pay records and other records of Plaintiff and Class Members; (8) participating in extensive settlement discussions; (9) preparing and circulating a detailed mediation and damages model; (10) participating in a face-to-face mediation facilitated by a private mediator; (11) preparing and drafting settlement papers including motions for preliminary approval and for final approval; (12) addressing claims of self-reporters and negotiating a resolution to same; and (13) overseeing the Claims Administrator in the administration of the Settlement and the issuance of notice. Class Counsel will also spend additional time continuing to administer the Settlement and in preparing for and attending the Final Fairness Hearing.

13. In addition, Class Counsel advanced all of the expenses of this litigation.

14. Class Counsel's entitlement to be paid has been wholly contingent upon achieving a good result.

15. The total amount of fees incurred by McGillivray Steele Elkin LLP is \$275,987.50 through October 5, 2023. The total amount of expenses incurred by McGillivray Steele Elkin LLP through October 5, 2023, is \$17,524.31. *See* Exhibit A.

16. The total amount of fees incurred by The Hedgpeth Law Firm PC is \$123,070.00 and the total expenses incurred by the firm is \$5,446.92. *See* Exhibit B.

17. The total amount of fees incurred by the Siegel Law Group PLLC is \$32,986.00. The Siegel Law Firm incurred \$2,282.42 in expenses. *See* Exhibit C.

18. As much as practicable, as Lead Class Counsel, I ensured that associates with lower hourly billing rates and paralegals with even lower hourly billing rates performed all of the work that they were fully capable of performing rather than having senior or junior partners perform such work. For example, associate Sarah Block performed 112.6 hours of work, whereas senior partner Gregory McGillivray performed only 1.8 hours of work on the case over its lifetime.

19. The recording of time and services by Class Counsel at each firm was done on a contemporaneous basis, and that information has been accurately extracted from each firm's billing records to prepare the summary fee listings in Exhibits A through C.

20. All of the time and labor set forth in this declaration have been, in fact, necessarily and reasonably expended on behalf of the Class in this action. The total time spent on this case by Class Counsel through October 5, 2023, is 807 hours.

21. Our firm has a total of thirteen attorneys and, for that reason, must carefully monitor the amount of time required by existing cases in determining whether to accept or pursue other matters. This case required substantial time and effort, including more than 311 hours of my services. This precluded me, and the other attorneys who worked on this case, from performing other available fee-generating work during the relevant period of time; this was a factor considered by our firm in deciding what fee-generating cases and other matters it could, and could not, pursue during this time frame.

22. The total expenses incurred by Class counsel through October 5, 2023, equals \$25,253.65, which is \$1,336.18 less than they will recover under the Settlement Agreement. The categories of expenses listed in Exhibits A-C are the type normally billed to the firms' paying clients. All expenses were reasonably and necessarily incurred in pursuing this case to a successful settlement. This does not include the costs of the Claims Administrator, whom, under the

Settlement Agreement, shall be paid directly from the settlement fund in an amount not to exceed \$9,600.00.

23. Based on the foregoing, the total amount of lodestar attorneys' fees chargeable by Class Counsel (but unpaid) through the dates listed above equal \$432,043.50. Thus, Class Counsel's requested fee equal to 1/3 percentage of the fund in this case results in a multiplier of 3.28.

24. Through the Claims Administrator, each class member was notified that the amount of fees sought by Class Counsel under the Settlement Agreement was \$1,416,666.67, and that the amount of unreimbursed expenses was \$23,917.47. According to the Claims Administrator, not a single Class Member objected to the Settlement Agreement or to the amount of fees and expenses sought by Class Counsel.

25. Through the Claims Administrator, each Class Member was notified of the amount of the Service Award to be paid to the Class Representative. According to the Claims Administrator, not a single class member objected to the Settlement Agreement or to the payment of or amount of the Service Award.

26. After accounting for Class Counsel's litigation expenses and fees, the third-party Administrator's costs, and the service payment to the Named Plaintiff, the average settlement payment is \$13,924.08.

27. Plaintiff Heckle, in her role as Class Representative, contributed a significant amount of time and effort to bring these claims, which ultimately benefit the entire Class, at great risk to herself. For example, the Plaintiff expended a significant amount of effort collecting documents to help counsel gather facts for the Complaint and for two different mediations. Plaintiff also sat for a lengthy deposition and was instrumental in helping Class Counsel prepare for

settlement discussions, helping counsel to understand the intricacies of the positions at issue and the Class Members' workload requirements, so that Class Counsel could zealously negotiate during mediation. Plaintiff Heckle also participated in the mediation/settlement process, including by participating in the in-person mediation which ultimately led to the instant settlement.

28. The requested Service Award to Plaintiff Heckle of \$15,000.00 represents less than 0.4% of the total settlement fund.

29. Two individuals contacted Plaintiffs' counsel and one individual contacted the Settlement Administrator claiming they should have been included in the Class but were not ("self-reporters"). They requested to participate in the Settlement. Class Counsel obtained information from each of the three self-reporters to confirm that they met the Class definition. Following this investigation by Class Counsel, the Parties agreed that the self-reporters should have been included in the Class, and that had they been included, they would have received \$31,178.56 between them applying the same methodology to calculate damages that was used for the original 200 Class Members. Rather than have that money come from the Net Settlement Fund intended only for the 200 Class Members on the original Class List, Defendant will deposit an additional \$31,178.56 (and the employer's share of payroll taxes on this amount) into the QSF for distribution to the three self-reporters at the time it deposits the Gross Settlement Fund into the QSF. These three individuals understand that they are now Class Members and that they are subject to the same Release as the original 200 Class Members.

I declare under penalty of perjury, pursuant to 28 U.S.C. Section 1746, that the foregoing is true and correct.

Dated: October 12, 2023

/s/ Molly A. Elkin
Molly A. Elkin

EXHIBIT A

McGILLIVARY STEELE ELKIN LLP

Summary of Attorneys' Fees

Report Period: 02/16/2021 to 10/5/2023

Miscellaneous

Matrix

Gregory McGillivary

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2021	620	0.50	\$310.00
2023	620	1.30	\$806.00
Sub Total:			\$1,116.00

Molly Elkin

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2021	620	99.30	\$61,566.00
2022	620	58.70	\$36,394.00
2023	620	153.00	\$94,860.00
Sub Total:			\$192,820.00

Sarah Block

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2021	410	16.50	\$6,765.00
2022	410	41.50	\$17,015.00
2023	410	54.60	\$22,386.00
Sub Total:			\$46,166.00

Hillary LeBeau

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2021	370	62.10	\$22,977.00
Sub Total:			\$22,977.00

Keith Nickerson

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2021	210	14.20	\$2,982.00
2022	210	2.70	\$567.00
2023	210	35.10	\$7,371.00
Sub Total:			\$10,920.00

Kathleen Dacruz

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2021	205	5.00	\$1,025.00
2022	205	0.10	\$20.50
2023	205	4.60	\$943.00
Sub Total:			\$1,988.50

Total \$275,987.50**Expenses** \$17,524.31**Grand Total:** \$293,511.81



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
GKM	9/16/2021	0.50	Conference with Molly about administrative exemption standard in New York and send her treatise on issue and cites
GKM	4/10/2023	0.20	Conference with MAE about no reversion and settlement position
GKM	4/26/2023	0.40	Conference with MAE regarding settlement terms
GKM	5/2/2023	0.30	Conferences regarding settlement terms
GKM	5/3/2023	0.40	Conferences with MAE about settlement
MAE	2/16/2021	0.20	Review emails and send email to Siegal about consent form for filing
MAE	2/17/2021	1.50	Review and edit complaint and research wage statement violation remedies; email to team about edits and filing complaint
MAE	2/18/2021	0.80	Oversee filing of complaint and prepare PHV papers
MAE	3/12/2021	0.30	Review and edit fee arrangement agreement
MAE	3/18/2021	0.20	Review and sign co-counsel agreement
MAE	4/13/2021	0.50	Review answer and court's order re case management; send email to counsel opposite in accordance with Order
MAE	4/19/2021	0.30	Review mediation order and emails with team about same and need for a call
MAE	4/20/2021	1.00	Prepare for and participate in call with team about mediation and next steps
MAE	4/21/2021	0.20	Emails with team and counsel opposite about mediation
MAE	4/23/2021	1.10	Review complaint and answer and other orders and prepare for initial conference with opposing counsel; participate in same and follow up with Travis about same
MAE	4/29/2021	0.80	Conference with opposing counsel about scope of mediation and follow up with team about same



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	5/3/2021	0.80	Review emails from Jack; review and edit mediation deferral letter
MAE	5/4/2021	0.30	Send proposed letter to Evan to file with court regarding mediation deferral
MAE	5/12/2021	0.30	Review and revise defendant draft of letter to court and circulate to team
MAE	5/13/2021	0.20	Email to counsel opposite about filing letter
MAE	5/14/2021	0.20	Review defendant's filing of letter re mediation
MAE	5/17/2021	2.50	Prepare emails to mediator and to Evan about Judge's denial of deferral request; prepare emails to team about same; review documents from plaintiff regarding mediation issues; conference with Travis about scope of mediation; prepare letter to court about scope of mediation and meaning of order
MAE	5/18/2021	1.00	Review and edit letter asking for clarification on order
MAE	5/19/2021	1.20	Emails about mediation; conference with GKM about same; review and prepare documents for production for mediation
MAE	5/19/2021	1.30	Review and analyze plaintiff documents; emails to staff about same; emails about pre mediation call
MAE	5/20/2021	0.20	Reach out to parties about pre mediation
MAE	5/24/2021	0.50	Review documents for production and email to Evan about same; email about Defendant's production
MAE	5/25/2021	0.30	Review files sent by defendant; conference with Rich and Keith about calculations
MAE	5/26/2021	0.30	Review documents to prepare for mediation conference; conference with Keith and Rich about damages
MAE	5/27/2021	0.40	Review defendant's discovery



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	5/28/2021	2.30	Prepare for and participate in conference with mediator; Follow up conference with team about same; conference with Keith about damages; follow up conference with Stacy and email to Evan about missing data; email to court about mediation dates
MAE	5/31/2021	0.50	Review spreadsheet sent by Travis; email to Keith and Rich about damages extrapolations
MAE	6/1/2021	1.90	Further research about [REDACTED] [REDACTED] emails about same; emails with co-counsel about assignments; review and analyze calculation of damages; research re [REDACTED]
MAE	6/2/2021	0.30	Emails with KAN about damages calculations; check in with opposing counsel about missing data
MAE	6/3/2021	0.30	Follow up emails with Keith and with opposing counsel about missing data
MAE	6/7/2021	3.50	Review and edit mediation statement; conference with Keith about damages model; emails with Jack about mediation statement
MAE	6/8/2021	2.20	Finalize mediation statement for distribution to team
MAE	6/10/2021	1.00	Conference with team about mediation strategy
MAE	6/11/2021	0.20	Conference with Travis about mediation statement
MAE	6/14/2021	2.10	Revise and finalize mediation statement; exhibits and damages model; conference with Evan about same; prepare file for mediation
MAE	6/15/2021	0.60	Conference with Travis about call with Pat; prepare for same; conference and emails about notice delivery
MAE	6/15/2021	1.50	Prepare for mediation; prepare opening statement



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	6/16/2021	1.50	Zoom with client about mediation strategy and expectations; study mediation statement; prepare opening
MAE	6/17/2021	0.30	Emails about confidentiality agreement and prepare for mediation
MAE	6/18/2021	3.50	Participate in mediation and conference with Keith and then with Travis about same
MAE	6/21/2021	1.50	Prepare Case Management Plan and circulate to team
MAE	6/24/2021	0.20	Email with opposing counsel about CMP and email with team about review of same
MAE	6/28/2021	0.20	Email opposing counsel about CMP and scheduling order
MAE	6/29/2021	1.00	Prepare for and participate in call with Evan about Civil Case Discovery Plan and scheduling order and follow up email to Mediator and separate one to Evan with revised CMP
MAE	7/1/2021	0.50	Prepare notice of filing of CMP and instructions to HL to file same after final review
MAE	7/12/2021	1.80	Prepare for and participate in call with Court and opposing counsel about claims and defenses, settlement, case management and discovery schedule; email follow up to team about next steps and strategy
MAE	7/13/2021	0.50	Zoom conference with team about status conference; discovery and briefing class certification
MAE	7/20/2021	0.20	Emails with Hillary about discovery requests
MAE	7/21/2021	2.20	Study Matrix docket and read declarations of Denton, Bahadar and review documents; edit and circulate initial disclosures
MAE	7/22/2021	1.50	Edit document request; research rule regarding interrogatories and edit same and ask Hillary to make further revisions



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	7/23/2021	1.50	Edits to discovery and emails to team about same and forward same to Evan
MAE	7/27/2021	0.50	Review defendant's disclosures and research company
MAE	8/12/2021	0.70	Review defendant's discovery requests; emails with team and with HL separately about preparing responses
MAE	8/19/2021	0.30	Emails about due date for defendant's discovery responses; emails with team about plaintiff's job duties
MAE	9/1/2021	1.00	Review and edit stipulated protective order; email to team about same
MAE	9/2/2021	0.50	Review protective order in <i>Weeks</i> ; email with team about edits to this protective order; email counsel opposite about same
MAE	9/3/2021	1.00	Review protective order and conference with Travis about same and edit same; emails with counsel opposite about same review and edit protective order and conference with Travis about same
MAE	9/7/2021	2.20	Review Defendant's responses to discovery; email to Keith about data produced; review and edit our discovery responses; emails with HL about same; search <i>Weeks</i> docket for further responsive documents
MAE	9/9/2021	1.80	Email to team about 30(b)(6) and discovery; review and edit Plaintiff response to rogs; review Defendant's responses to Rogs
MAE	9/10/2021	1.30	Review and edit document responses; conferences with HL about same; review documents; emails with team
MAE	9/13/2021	0.30	Review Thompsons edits to discovery responses and emails with Hillary about finalizing and serving same



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	9/14/2021	2.50	Prepare for and participate in conference with team re discovery issues and class certification issues; review defendant's production for deficiencies; prepare 30(b)(6) notice; review attorney notes re discovery in <i>Weeks</i> case
MAE	9/15/2021	0.30	Conference with HL about discovery issues
MAE	9/16/2021	2.90	Research NYLL exemption; review complaint and answer; prepare 30b 6 notice; conference with Hillary about discovery deficiencies; emails to team about different language in NYLL exemption
MAE	9/17/2021	3.90	Prepare, edit, finalize and serve FRCP Rule 30(b)(6) notice of deposition; emails with team about same and about strategy; research case law for deficiency letter re defendant's discovery
MAE	9/22/2021	0.40	Review defendant's notice of deposition and response to our notice and email to team about same
MAE	9/24/2021	0.20	Emails about depositions
MAE	9/29/2021	0.20	Conference with HL about discovery deficiency letter
MAE	9/30/2021	0.40	Conference about discovery with associate; follow up emails to opposing counsel about 30b6 depositions
MAE	10/1/2021	2.80	Review and edit discovery deficiency letter; read Judge Nathan decision on Claims Examiners for MetLife; emails with team about same
MAE	10/4/2021	0.50	Review defendant's email and discovery letter
MAE	10/5/2021	0.90	Arrange for Sarah to replace Hillary; email to team about need for call and strategy
MAE	10/6/2021	0.30	Prepare for conference with team about strategy
MAE	10/7/2021	1.00	Study Matrix deficiency letter; conference by Zoom with team about next steps and send email to counsel opposite about same



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	10/13/2021	1.30	Phone conference with Erica about claims and discovery status; emails with opposing counsel; send email with documents to Erica for review
MAE	10/14/2021	0.20	Emails about discovery conference
MAE	10/18/2021	3.90	Prepare for and participate in Meet and Confer on Defendant Rog and document responses and 30(b)(6) objections; meet and confer on Plaintiff's alleged deficient responses; emails and calls following meeting with team to determine best strategy re [REDACTED]
MAE	10/19/2021	3.50	Review notes from call; prepare comprehensive response to defendant about next steps and discovery deficiencies; conference with paralegal about document project for class cert
MAE	10/20/2021	0.70	Review defendant's letter and email to Travis about strategy
MAE	10/21/2021	0.90	Review and edit letter to court and email to opposite counsel re deadlines and briefing schedule
MAE	10/22/2021	2.70	Multiple emails and conferences on discovery issue; study research regarding pre-certification discovery; conference call with counsel opposite; edit joint letter and discovery order
MAE	10/26/2021	0.20	Email from defendant about need for more time
MAE	10/28/2021	0.30	Conference with SMD and Travis about plan for defendant's discovery deficiency response
MAE	11/4/2021	2.20	Analyze Defendant's 15-page letter re discovery; prepare memo to file about same and conference with Sarah about response
MAE	11/9/2021	1.50	Review and edit discovery letter and share with team and send to counsel opposite
MAE	11/10/2021	0.50	Zoom conference with Jack and Travis about next steps, discovery and Rule 23 motion; follow up email about assignments related to same



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	11/15/2021	1.20	Review defendant's response to discovery; emails with Erica about same; conference with Erica about ESI; review defendant's document response
MAE	11/17/2021	0.70	Respond to defendant about 30(b)(6) depositions; review, edit and circulate letter re Heckle discovery and preservation of ESI
MAE	11/18/2021	1.00	Conference with Jack and then with Sarah about 30b6 depositions; review exhibit and divide up work; review documents produced and index
MAE	11/19/2021	0.20	Emails about new production from defendant
MAE	11/23/2021	0.20	Email from counsel opposite about 30b6 deposition objections
MAE	11/24/2021	0.50	Conference with SMB and emails about Defendant's discovery response re 30b6
MAE	11/29/2021	1.20	Analyze defendant's 30(b)(6) position and prepare email to team; review documents for deposition preparation
MAE	12/6/2021	0.40	Emails about need to file procedural motion and status of discovery
MAE	12/7/2021	0.50	Review and edit letter motion to extend time periods; emails about same
MAE	12/8/2021	0.20	Review Court's order and schedule conference
MAE	12/16/2021	0.20	Email to defendant about 30(b)(6) depositions
MAE	1/3/2022	0.30	Reach out to defendant to schedule 30(b)(6)
MAE	1/4/2022	1.10	Prepare for 30(b)(6) depositions and email to team about same
MAE	1/5/2022	3.00	Review documents for 30(b)(6) depositions; plan agenda for meeting with team; conduct team meeting; conference about exemption defense; send follow up email to opposing counsel about discovery and LTDs and depo dates



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Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	1/6/2022	0.40	Prepare email to team about assignments and due dates and documents
MAE	1/7/2022	1.10	Prepare for 30(b)(6) and prepare email about topic 10 and defendant's refusal to produce witnesses on certain aspects; coordinate plaintiff deposition date
MAE	1/10/2022	0.20	Email with SMB about status of outlines and meeting with team
MAE	1/11/2022	0.30	Conference with SMB about depo outlines and prep
MAE	1/13/2022	0.30	Emails about Erica Heckle deposition
MAE	1/17/2022	1.80	Review documents for team meeting and 30(b)(6) depositions; begin review and edit of outlines
MAE	1/19/2022	0.50	Participate in team meeting regarding exhibits for discovery and strategy for same
MAE	1/20/2022	0.20	Emails about call with Erica
MAE	1/21/2022	1.00	Prepare for FRCP 30 b6 deposition
MAE	1/24/2022	0.60	Conference with SMB about exhibits and depositions; texts with Stacy about meeting with Erica
MAE	1/25/2022	0.30	Review documents for deposition and conversation with paralegal about same
MAE	1/26/2022	2.90	Prepare for 30(b)(6) depositions on Topics 8, 3, 5 and 7; emails with SMB about further documents; emails with team about finalizing documents for binder
MAE	1/27/2022	3.90	Review and analyze documents; analyze various payroll systems; emails with KAN about same; emails with SMB about outlines; revise outlines for 30(b)(6) deposition; research exemption issues
MAE	1/28/2022	4.50	Research Matrix business model; review and analyze documents; produce document that



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Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
			should have been produced to us; emails with defense counsel about pulling witness at last minute; revise outlines
MAE	1/31/2022	0.20	Emails with court reporter and team about rescheduling
MAE	2/4/2022	2.90	Review and analyze documents in advance of depositions; conference with Travis about Matrix' failure to produce responsive documents; email with SMB about adding document to exhibits
MAE	2/7/2022	2.90	Research admin exemption; prepare for 30(b)(6) depositions; conference with SMB and then with entire team about same and about strategy; read Weeks deposition transcripts
MAE	2/8/2022	1.90	Research exemption cases; emails, texts and phone calls with teams about depositions and strategy
MAE	2/9/2022	4.50	Participate in 30(b)6 depositions and conference calls with team about strategy
MAE	2/15/2022	0.30	Research docket for due dates; emails with team about briefing Rule 23 motion and need for conference
MAE	2/16/2022	0.70	Zoom meeting with team about strategy for Rule 23 cert motion and deadlines for declaration; statement of facts and brief
MAE	2/28/2022	0.20	Email re scheduling Heckle deposition
MAE	3/2/2022	0.20	Emails about depositions
MAE	3/3/2022	0.30	Follow up email with team about briefing
MAE	3/4/2022	0.20	Texts with Travis about scope of proposed class
MAE	3/8/2022	0.30	Email re motion to strike if defendant provides declarations; conference with Travis about settlement issues
MAE	3/9/2022	1.20	Prepare declaration for Rule 23 motion; conferences with Travis about settlement and about motion



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	3/10/2022	0.20	Review and edit procedural motion; review order
MAE	3/11/2022	0.40	Conference with Travis about settlement possibilities and strategy
MAE	3/14/2022	0.40	Emails about settlement issues and emails about Rule 23 cert brief
MAE	3/15/2022	0.60	Emails about Rule 23 brief and need for edits; conferences with SMB and then with Travis and Stacy about same
MAE	3/17/2022	0.40	Conference with Travis about status of cert motion and settlement possibilities
MAE	3/18/2022	0.50	Emails about motion; conference with SMB about changes and reorganizing; email to team about filing
MAE	3/21/2022	0.90	Multiple emails about finalizing brief and exhibits; conference with Travis about same and separately with Sarah about same
MAE	3/22/2022	0.30	Conference with Travis about emailing Evan about settlement
MAE	3/31/2022	0.30	Phone conference with Travis and SMB about settlement issues and strategy
MAE	4/5/2022	0.40	Emails about defendant motion for extension and about possible motion to strike happy camper declarations
MAE	4/6/2022	0.70	Multiple phone conferences with Stacy and Travis about settlement and deposition strategy
MAE	4/7/2022	1.10	Emails and calls about Heckle deposition; sort out issues with Planet Depos; review emails about settlement
MAE	4/18/2022	0.40	Review email from Evan about briefing deadlines; conference with Travis about same
MAE	4/19/2022	0.20	Review emails and letter motion
MAE	4/20/2022	0.20	Review Court's order re scheduling and briefing



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	4/26/2022	0.20	Emails about settlement options
MAE	5/9/2022	0.40	Emails about defendant's latest request for extension; response to same and conference with Travis about same
MAE	5/10/2022	0.20	Review court's order regarding class briefing
MAE	5/23/2022	1.90	Review and analyze Defendant's opposition brief and emails with team about reply and next steps
MAE	5/31/2022	0.30	Emails about procedural motion
MAE	6/2/2022	0.20	Emails about procedural motion
MAE	6/16/2022	0.20	Conference with SMB about Matrix reply
MAE	6/20/2022	0.20	Texts about status of reply brief
MAE	6/21/2022	1.20	Review reply brief and emails with SMB about edits to same
MAE	6/22/2022	0.30	Conference with Travis about filing; review same
MAE	6/27/2022	0.20	Review court order on Exhibit A
MAE	11/28/2022	0.60	Read defendant's notice; conference with Travis about response to same
MAE	12/5/2022	0.50	Review and edit Response letter
MAE	12/15/2022	2.50	Study decision; Review discovery orders; prepare plan; emails with team
MAE	12/16/2022	1.10	Participate in call with team about damages discovery produced; participate in follow up call with Travis and SMB about next steps
MAE	12/19/2022	3.50	Review discovery and correspondence related to same; prepare letter re damages discovery to send to Defendant
MAE	1/17/2023	1.90	Review and edit class notice; review last letter to defendant about discovery deficiencies; prepare follow up; conference with SMB about joint letter regarding proceedings



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	1/18/2023	1.20	Review orders; conference with team about strategy for call with defense counsel tomorrow
MAE	1/19/2023	1.40	Prepare for and participate in conference with defense counsel about case management issues; follow up call with team
MAE	1/20/2023	2.90	Review and edit draft joint letter to the court; emails to team about same; edits to notice; emails to defendant about both; research absent class member discovery
MAE	1/23/2023	2.50	Review file; study class cert briefing, and discovery conducted to date to prepare for argument about why merits discovery complete
MAE	1/24/2023	2.90	Conferences with defense counsel about letter and settlement; conf with team about strategy; revise letter and send to defendant; file same; research mediators; review Court's order and emails about same
MAE	1/31/2023	0.20	calendar dates to make sure defendant produces on time
MAE	2/8/2023	0.50	Review class list and email to KAN about preparing for damages and comparing list to collective list
MAE	2/9/2023	1.40	Review class lists; analyze same prepare email to Evan about deficiencies
MAE	2/13/2023	0.20	Follow up email to Evan about mediator Sonnenburg
MAE	3/1/2023	0.90	Research mediator; prepare email to mediator about case and availability; follow up communications with team
MAE	3/13/2023	0.30	Emails about damages with team
MAE	3/17/2023	0.50	Emails about mediation and calculations
MAE	3/20/2023	3.50	Review damages calculations; review mediation agreement; emails with mediator; conference with team to go over calculations and strategy



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	3/22/2023	0.30	Review fee summary
MAE	3/23/2023	0.20	Conference with SMB about mediation agreement and fees
MAE	3/24/2023	2.00	Revise settlement letter; review statute and discover salary threshold violation; emails and conferences with KAN about same
MAE	3/28/2023	0.30	Mediation preparation
MAE	4/4/2023	0.20	Review and sign mediation agreement
MAE	4/5/2023	1.30	Emails about conf; prepare for mediation; conf with Travis about salary threshold issue; conf with JAMS about payment
MAE	4/6/2023	2.80	Review damages models and prepare mediation letter; conference with SMB about same
MAE	4/7/2023	4.30	Prepare for mediation; review emails and documents; review fee listings; update mediation letter; prepare for and participate in conference with mediator; pre-mediation conference with Travis
MAE	4/10/2023	1.50	Prepare for and participate in meeting re damages spreadsheets and follow up email with counsel opposite
MAE	4/11/2023	2.80	Multiple conference with team and expert re damages model; conferences and emails about strategy for settlement; conf with SMB about mediation statement
MAE	4/12/2023	2.20	Review and edit mediation statement
MAE	4/13/2023	2.50	Prepare settlement demand; emails with Travis about same; revise mediation statement
MAE	4/14/2023	2.90	Further edits to settlement demand; review damages model; revise mediation statement to be consistent with settlement demand; conference with SMB about same
MAE	4/19/2023	0.20	Emails with SMB about mediation statement



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	4/24/2023	0.50	Prepare for mediation
MAE	4/25/2023	2.20	Prepare for mediation; call and Zoom with Heckle to explain mediation strategy and to go over spreadsheets
MAE	4/26/2023	6.50	Study files and damages and different scenarios; communications with settlement team; prepare for mediation
MAE	4/27/2023	10.00	In person mediation and settle case; review and revise term sheet. Conferences with team and plaintiff re next steps.
MAE	4/28/2023	1.90	Reach out to Settlement Administrators for estimates; emails with team about same; email to Evan about term sheet; draft settlement agreement
MAE	5/1/2023	3.90	Prepare settlement; emails about fees and expenses; conference with SMB about separate fee petition and preliminary approval motion; research same
MAE	5/2/2023	4.50	Prepare settlement agreement and review calculations, determine distribution methodology and communications with Travis about same; communications with settlement administrator; review contract
MAE	5/3/2023	4.90	Revise settlement agreement; conferences with GKM, and separately with TH and KAN about settlement terms and dispute issues; review court orders; prepare letter to court re settlement status; prepare correspondence to defendant about next steps and settlement administrator
MAE	5/4/2023	0.30	Begin drafting notice to class; emails with TH about status of settlement review
MAE	5/5/2023	3.50	Prepare Notice of settlement to class; revise settlement agreement; revisions to Notice; conference with SMB about same; send correspondence and drafts to Evan



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	5/9/2023	0.20	Emails with Matrix about settlement and supplemental data
MAE	5/12/2023	0.20	Emails regarding status of settlement
MAE	5/15/2023	0.30	Conference with SMB about motion for preliminary approval
MAE	5/17/2023	0.20	Follow up email to defense team about data
MAE	5/19/2023	1.10	Email correspondence with defendant about data and settlement; review data; prepare and send response re status and settlement administrator
MAE	5/22/2023	1.60	Research new administrators and obtain quotes; conference with SMB about brief and status; revise and send defense counsel status report due tomorrow
MAE	5/23/2023	2.50	Conference with RED and KAN about class list; prepare emails to Defendant about missing information and confirmation about dates of coverage; emails about settlement administrator; Oversee filing of status report
MAE	5/24/2023	0.20	Review court's order re settlement papers
MAE	5/25/2023	0.90	Review additional quotes from claims administrators; emails with defendant and team about updated data; email to defendant about settlement draft
MAE	5/26/2023	0.50	Email to defense team about settlement status
MAE	5/30/2023	0.70	Follow up telephone call with Jamie about settlement and settlement administrator; emails with SMB about briefing and status
MAE	5/31/2023	1.10	Work on parts of motion for preliminary approval briefing regarding recovery and percentages
MAE	6/1/2023	1.80	Email to defendant about status of settlement agreement edits; research Rule 23(e); read and edit motion for preliminary approval
MAE	6/2/2023	2.80	Review and analyze Defendant's edits to settlement and notice and circulate emails to



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
			team about same; review and edit memo in support of preliminary approval
MAE	6/5/2023	5.50	Conference with KAN and RED about settlement numbers; revise comparison charts; finalize class list and distribution amounts; revise memo in support of preliminary approval; add missing sections; research service awards and emails with SMB about finalizing memo for defendant; revise motion in support of approval
MAE	6/6/2023	4.80	Finalize settlement; emails with client about same; review and edit memo in support; review and edit declaration; review distribution sheet and send to defense counsel; email to administrator about status and changes to administration
MAE	6/7/2023	1.70	Emails with team; conference with SMB about filing; finalize brief and declaration for circulation to team and then to defendants; review email from administrator about next steps
MAE	6/8/2023	1.60	Emails about settlement; revise 5.3; prepare email about same; review and edit order and motion; email to Erica about timelines
MAE	6/9/2023	1.40	Review Travis' edits to memorandum; finalize settlement papers and forward same to defense team with email
MAE	6/12/2023	0.30	Emails and texts regarding status of signed agreement
MAE	6/13/2023	0.40	Follow up with KD about DocuSign; follow up with defense counsel about status of settlement papers
MAE	6/14/2023	0.20	Emails about finalizing brief without defendant's comments
MAE	6/15/2023	1.10	Emails with defense counsel about settlement papers; review defendant's edits and send back comments; conference with SMB about same



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	6/16/2023	3.30	Review and finalize all settlement papers; conferences with SMB about same and with paralegal about obtaining signatures; revise declaration and other documents; emails with counsel opposite about same; oversee filing of settlement papers
MAE	6/23/2023	1.00	Review filing; conference with SMB about next steps; prepare and send filings to settlement administrator; review timing and send class damages to administrator; email to defense about class list
MAE	6/28/2023	1.10	Review Court's order; email to Settlement Administrator and team about same and about calendar for notice; follow up emails on same; emails to co-counsel about fee listing
MAE	6/30/2023	1.10	Review settlement; respond to settlement administrator about funding and timelines
MAE	7/3/2023	1.00	Settlement administration; figure out discrepancies in NSF amounts in various documents; email to Rust in response to questions
MAE	7/6/2023	0.30	Settlement administration issues
MAE	7/10/2023	0.50	Settlement administration emails and phone call to Jamie about missing data
MAE	7/11/2023	1.50	Review and edit Notice; send comments to administrator; respond to admin questions
MAE	7/12/2023	0.30	Conference with KAN re claims administrator information
MAE	7/13/2023	0.50	Emails about allocations and changing the amounts
MAE	7/13/2023	0.20	Meeting with KAN re data; review same
MAE	7/17/2023	1.00	Review and edit notice and email to team and administrator about same; check numbers in notice



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	7/18/2023	0.20	Settlement administration emails
MAE	7/20/2023	0.20	Emails with Rust re settlement administration and formal retainer
MAE	7/26/2023	0.20	Review Settlement Admin week 1 report
MAE	7/27/2023	0.80	Review and edit fee listings for final approval motion
MAE	8/1/2023	0.20	Review report from administrator
MAE	8/3/2023	0.70	Research claim of Nathaniel Kramer and reach out to claims administrator and defense counsel about same
MAE	8/7/2023	0.50	Review documents from Kramer; emails about adding damages for this unidentified class member
MAE	8/8/2023	0.20	Review and analyze weekly report from Claims Administrator
MAE	8/15/2023	0.60	settlement administration; emails with defendant and self reporting class member; review weekly status report from Rust
MAE	8/16/2023	0.50	Conference with SMB about final approval brief and petition for fees; email to office manager about fee listing
MAE	8/17/2023	0.30	Review and edit fee listing.
MAE	8/18/2023	0.50	Read and edit fee listing; redact confidential material
MAE	8/21/2023	0.50	Edit fee listing as part of due diligence for Lodestar cross check in petition for fees
MAE	8/22/2023	3.10	Further editing of bills and narratives; remove time for various timekeepers for billing discretion; prepare declaration in support of fee petition; emails with self-reporting class members
MAE	8/23/2023	1.00	Review documents from self-reporting class member; send email to defense team re same;



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
			send emails to administrator about another self-reporter
MAE	8/29/2023	0.90	Review and edit co-counsel fees for lodestar crosscheck; review settlement administrator report
MAE	8/30/2023	0.80	Conference with SMB about self-reporters; emails with administrator and with Matrix about status of same
MAE	8/31/2023	0.20	Conference with SMB about fee motion
MAE	9/6/2023	0.40	Prepare memo about self-reporters and reach out to defendant about same
MAE	9/8/2023	1.70	Review and edit fee petition; email to SMB about same; emails with settlement administrator about self id class members
MAE	9/12/2023	0.20	Review administrator's weekly report
MAE	9/13/2023	0.20	Emails with SMB about final approval motion
MAE	9/14/2023	0.30	Review emails and send follow up to defense
MAE	9/18/2023	0.40	Reach out to defendant again about self-reporters; conference with partner about same
MAE	9/19/2023	1.50	Research agreement and term sheet; email to defense counsel about its position re self-reporters
MAE	9/20/2023	1.10	Research claims of Imperati; conference with her; prepare and send follow up email to OC re same and why she should be included in class; data conference with KAN
MAE	9/21/2023	2.20	Research defendant's discovery to determine chain of command for supervisors and Hawthorne office for self-reporters; conferences with SMB about same; prepare spreadsheet and documents and send email to OC about inclusion and next steps;
MAE	9/22/2023	0.20	Reach out to defense re final approval motion



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
MAE	9/25/2023	0.20	Emails about status of our request
MAE	9/26/2023	0.30	Email from SMB about status of final approval brief and strategy; separate email to defense team regarding same
MAE	9/27/2023	1.20	Discussion with SMB about self-reporters; read and edit final approval brief
MAE	9/28/2023	2.50	Review and edit memorandum of law in support of final approval; strategy discussion about three self-reports; study Rust's reports; conference with SMB about strategy for including self-reports
MAE	9/29/2023	0.40	Review brief; prepare email to defense counsel and send same
MAE	10/3/2023	0.20	Follow up email to Evan about self-reports
MAE	10/4/2023	1.20	Revise Rust declaration; emails with Evan about status of self-reports; conference and emails with SMB re same and final approval motion
MAE	10/5/2023	2.50	Conference with Evan about self-reports; further edits to declaration of Rust; review fees; email to office manager about updating same; Review amounts for self-reports; conference with SMB about same; prepare individual emails to self-reports about settlement and release; phone conference with class member about same
SMB	10/5/2021	0.30	Draft and file notice of appearance
SMB	10/6/2021	0.20	Correspondence re team status meeting
SMB	10/7/2021	0.50	Call with team re discovery issues, class certification
SMB	10/18/2021	1.30	Discovery conference with defense counsel, follow-up conference with plaintiff's counsel team
SMB	10/19/2021	0.60	Review discovery email to opposing counsel, research re pre-certification discovery
SMB	10/22/2021	0.40	Review emails, conference with defense counsel re scheduling order and discovery issues



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
SMB	10/28/2021	0.70	Research and draft memo re scope of pre-certification discovery
SMB	10/29/2021	0.50	Review mediation statement and case file
SMB	11/5/2021	1.50	Research and draft discovery deficiency letter
SMB	11/8/2021	1.00	Research and draft response to discovery letter
SMB	11/9/2021	0.20	Review revised discovery letter, correspondence with co-counsel re discovery call
SMB	11/10/2021	0.50	Conference with plaintiff team re discovery and class cert
SMB	11/15/2021	1.40	Conference with Heckle re [REDACTED] [REDACTED] office correspondence re discovery index; draft letter to matrix re ESI
SMB	11/18/2021	0.60	Review discovery index and correspondence re same; review notice and prepare for 30(b)(6) deposition
SMB	11/19/2021	0.70	Review and draft deposition outline for Rule 30(b)(6); correspondence re additional documents produced
SMB	11/23/2021	2.30	Review discovery and draft Rule 30(b)(6) outline
SMB	11/24/2021	0.90	Draft Rule 30(b)(6) outline; review letter from defendant on deposition objections
SMB	11/29/2021	0.20	Conference and correspondence re 30(b)(6) depo
SMB	12/7/2021	0.30	Review and revise letter to court re discovery extension
SMB	12/27/2021	0.90	Research and draft memo on the application of the administrative exemption in the Second Circuit
SMB	12/28/2021	1.50	Research and draft memo on FLSA and NYLL administrative exemption



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
SMB	1/5/2022	2.00	Correspondence re discovery scheduling, conference with co-counsel re depositions and case strategy
SMB	1/10/2022	1.70	Review documents and prepare outlines for Rule 30(b)(6) depo
SMB	1/11/2022	0.40	Conference with MAE re discovery, depositions
SMB	1/13/2022	0.60	Review documents and draft for deposition outlines
SMB	1/18/2022	1.30	Draft deposition outlines
SMB	1/19/2022	1.00	Correspondence re deposition exhibits, conference re deposition and NYLL issues; conference with team re deposition prep
SMB	1/21/2022	0.20	Conference re depositions
SMB	1/24/2022	1.30	Conference with Heckle [REDACTED]
SMB	1/26/2022	0.30	Review and update deposition exhibits, correspondence re depositions
SMB	1/27/2022	0.30	Review pay documents and deposition outlines in prep for depositions
SMB	1/28/2022	0.60	Correspondence with defendant re depositions, production of new documents
SMB	2/4/2022	0.30	Correspondence with opposing counsel re deposition, update deposition exhibits
SMB	2/7/2022	2.60	Correspondence re depositions and office conferences and conference with co-counsel re deposition preparation and strategy; review exhibits and prepare outlines
SMB	2/8/2022	8.00	Take and participate in Rule 30(b)(6) deposition; revise outlines, conference with co-counsel in preparation for deposition
SMB	2/9/2022	4.20	Rule 30(b)(6) deposition, follow up office conference re same



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
SMB	2/16/2022	0.60	Conference with team re Rule 23 motion and strategy
SMB	2/25/2022	1.50	Digest 30(b)(6) to identify Rule 23 testimony
SMB	3/3/2022	0.20	Conference with MAE re case status, class certification
SMB	3/15/2022	0.80	Correspondence re Rule 23 motion; review draft motion
SMB	3/18/2022	5.40	Review and revise memo of law, draft notice of motion; conference with co-counsel re edits
SMB	3/21/2022	1.40	Revise declarations, motion for class cert; correspondence re same
SMB	3/31/2022	0.30	Conference with MAE, co-counsel re settlement status, deadlines, request for discovery extension
SMB	4/7/2022	0.20	Correspondence re depositions, discovery
SMB	4/26/2022	0.20	Review correspondence re settlement and mediation
SMB	5/23/2022	0.30	Review Matrix opposition
SMB	6/16/2022	0.20	Conference and correspondence with MAE, co-counsel re reply brief
SMB	6/21/2022	1.40	Conference with co-counsel re reply brief
SMB	7/28/2022	0.30	Review Arizona case docket, class cert information
SMB	11/23/2022	0.30	Office conference, correspondence re filing by Defendants and <i>Weeks</i> case order
SMB	12/5/2022	1.50	Review and edit letter in response to <i>Weeks</i> order
SMB	12/14/2022	0.30	Review class cert decision, correspondence re same
SMB	12/15/2022	0.20	Correspondence re expert discovery, next steps
SMB	12/16/2022	1.20	Office conference re damages and discovery issues, call with co-counsel re same



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Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
SMB	12/19/2022	0.40	Research and correspondence re expert disclosures, edit discovery letter
SMB	1/17/2023	2.00	Draft Rule 23 notice and joint status letter
SMB	1/18/2023	0.70	Correspondence re call with defendant, conference with plaintiff team re status report and discovery/case/summary judgment strategy
SMB	1/19/2023	0.80	Conference with defendant, co-counsel re discovery plan
SMB	1/20/2023	1.60	Research and draft joint letter and revise notice; conference with plaintiff re [REDACTED]
SMB	1/24/2023	0.60	Conference with MAE re case strategy, review draft letter
SMB	1/31/2023	0.20	Correspondence re upcoming deadlines, mediation
SMB	3/1/2023	0.20	Office correspondence and review correspondence with mediator
SMB	3/20/2023	1.10	Correspondence with plaintiff re mediation, office conference re damages and mediation
SMB	3/21/2023	0.50	Draft settlement demand
SMB	3/22/2023	2.30	Research and draft settlement demand letter
SMB	3/23/2023	0.40	Office conference re case status, strategy
SMB	3/29/2023	0.30	Office correspondence re mediation, plaintiff question
SMB	3/30/2023	0.20	Correspondence with plaintiff re case status
SMB	4/6/2023	1.10	Research and revise settlement demand
SMB	4/7/2023	0.70	Conference with mediator, follow up conference with MAE; review settlement demand draft
SMB	4/11/2023	3.80	Correspondence re mediation statement and settlement, meeting re damages analysis; draft mediation statement
SMB	4/12/2023	0.20	Review updated mediation statement draft



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
SMB	4/13/2023	0.30	Conference with MAE re settlement, review settlement demand
SMB	4/14/2023	0.30	Correspondence re mediation, review settlement demand edits
SMB	4/20/2023	0.80	Revise and finalize mediation statement, submit same
SMB	4/25/2023	0.50	Conference with Heckle, MAE and KAN re mediation
SMB	4/26/2023	0.20	Office conferences and correspondence re mediation
SMB	4/27/2023	2.80	Office conferences and mediation discussions, research re wage statement claim
SMB	5/1/2023	0.40	Conference with MAE re settlement, review correspondence re settlement terms and approval
SMB	5/5/2023	1.80	Review and edit settlement agreement draft, class notice; conference with MAE re same
SMB	5/10/2023	1.20	Research and draft motion for preliminary approval
SMB	5/11/2023	0.30	Research and draft settlement preliminary approval motion
SMB	5/15/2023	0.30	Conference with MAE re motion for preliminary approval
SMB	5/19/2023	0.20	Correspondence re status report, data production status
SMB	5/22/2023	0.40	Discussion with MAE re brief
SMB	5/30/2023	3.60	Research and draft preliminary approval motion; correspondence re same
SMB	5/31/2023	4.00	Research and draft preliminary approval order, cover notice, declaration and office correspondence re same



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Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
SMB	6/6/2023	0.80	Research and revise settlement approval motion, correspondence re same
SMB	6/7/2023	0.20	Conference with MAE re preliminary approval filing, settlement issues
SMB	6/8/2023	0.40	Draft proposed order; review correspondence with defendant, plaintiff re settlement issues
SMB	6/9/2023	0.20	Edit preliminary approval motion
SMB	6/14/2023	0.30	Correspondence re motion for preliminary approval
SMB	6/15/2023	0.60	Revise and edit motion for preliminary approval, conference with paralegal re TOC/ TOA; conference with MAE re defendant edits
SMB	6/16/2023	2.20	Revise preliminary approval papers; finalize and file motion, office conference with MAE re same
SMB	6/23/2023	0.20	Conference with MAE re next steps
SMB	6/28/2023	0.20	Review preliminary approval order, correspondence re same
SMB	7/6/2023	0.30	Correspondence with settlement administrator, MAE re settlement notice issues
SMB	7/10/2023	0.20	Correspondence and call with MAE re settlement notice status, next steps
SMB	8/8/2023	0.20	Review correspondence with Rust regarding timelines for notice deadline and declaration production and status reports, correspondence with MAE
SMB	8/16/2023	0.40	Conference with MAE re fee petition, final approval motion and settlement issues
SMB	8/28/2023	0.20	Correspondence with KSF, MAE re fee petition
SMB	8/30/2023	0.30	Correspondence with MAE re self-reports, Rust status updates



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Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
SMB	8/31/2023	3.00	Research and draft fee petition, conference with MAE
SMB	9/6/2023	1.20	Research and draft fee petition
SMB	9/7/2023	1.20	Research and draft fee petition and correspondence re same; research and draft motion for final settlement approval; draft cover motion for fee petition
SMB	9/11/2023	1.30	Draft final approval motion; edit motion for fees
SMB	9/12/2023	1.70	Research and draft final approval motion
SMB	9/13/2023	1.20	Research and draft final approval motion, correspondence re same
SMB	9/19/2023	0.40	Review eligibility email from Defendants, correspondence with MAE re same
SMB	9/21/2023	1.40	Conferences with MAE, review documents and correspondence re settlement issues
SMB	9/26/2023	0.60	Update final approval brief, correspondence re same
SMB	9/27/2023	0.50	Edit motion for final approval, conference with MAE re same
SMB	9/28/2023	1.00	Conference with MAE re final approval motion, fee motion and strategy; edit motion for final approval
SMB	10/4/2023	0.20	Conference and correspondence with MAE re final approval motion, Rust declaration
SMB	10/5/2023	0.40	Conference with MAE re status of final approval motion, information from defendants and self-reporters
HL	2/18/2021	2.30	Review local rules; finalize and file case initiating documents
HL	2/19/2021	0.20	Emails re: pro hac vice motion
HL	2/19/2021	0.20	Emails re: summons
HL	2/23/2021	0.30	Correspondence with co-counsel re: docket



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Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
HL	3/5/2021	0.20	Emails re: pro hac vice applications
HL	4/1/2021	0.40	Review docket
HL	4/13/2021	0.50	Review docket
HL	4/16/2021	0.20	Review docket
HL	4/20/2021	0.80	Review docket; conference with co-counsel re: mediation
HL	4/29/2021	1.10	Draft letter to court re: mediation referral order; conference with opposing counsel re: same
HL	5/18/2021	2.10	Research and revise letter re: mediation; finalize and file letter
HL	6/14/2021	1.30	Review mediation statement; prepare exhibits
HL	6/15/2021	1.20	Research [REDACTED]
HL	6/16/2021	1.30	Conference with office counsel and Plaintiff re: mediation
HL	6/18/2021	3.00	Attend mediation
HL	7/1/2021	0.80	Finalize and file proposed case management plan
HL	7/8/2021	0.20	Emails re: initial case management conference
HL	7/13/2021	1.70	Conference with office counsel re: class certification; review case management plan and docket
HL	7/20/2021	3.20	Draft initial disclosures and discovery requests
HL	7/22/2021	2.40	Revise initial discovery requests
HL	8/12/2021	0.30	Emails re: discovery
HL	8/16/2021	0.20	Emails re plaintiff discovery
HL	8/19/2021	0.30	Emails re: plaintiff discovery
HL	8/23/2021	2.10	Prepare for and conduct discovery interview with plaintiff



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
HL	8/30/2021	2.10	Review plaintiff interview notes; research re: discovery responses and objections
HL	8/31/2021	4.20	Research discovery objections in SDNY
HL	9/1/2021	2.10	Review local rules, plaintiff interview notes, draft responses to defendant's first set of interrogatories
HL	9/2/2021	2.70	Research and draft responses to defendant's first set of interrogatories
HL	9/3/2021	5.10	Research re: FRCP 34; draft plaintiff responses to request for production of documents
HL	9/7/2021	0.50	Emails re: discovery responses
HL	9/8/2021	0.60	Review plaintiff documents
HL	9/9/2021	1.50	Conference re: discovery responses; review same; review and bates stamp documents to produce; emails re: same
HL	9/10/2021	2.00	Conferences re: plaintiff discovery responses; revise same
HL	9/13/2021	2.10	Conferences re: written discovery; revise and finalize plaintiff's discovery responses
HL	9/14/2021	1.00	Conference re: discovery and class certification; emails re: same
HL	9/17/2021	4.10	Review documents produced by defendant; research pre-certification class discovery
HL	9/30/2021	3.00	Research; draft discovery deficiency letter to defendant
HL	10/1/2021	4.00	Finish drafting deficiency letter to defendant
HL	10/5/2021	0.30	Draft motion for HDL to withdraw from case
HL	10/7/2021	0.50	Conference with office counsel re: discovery
KAN	5/25/2021	0.60	Review data and prepare damages calculations methodology



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Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
KAN	5/27/2021	1.10	Review Matrix data and prepare damages calculations with DeBoard
KAN	5/28/2021	0.60	Review data with Elkin; revise damages calculations; discuss case status
KAN	6/1/2021	2.40	Review data and prepare damages calculations
KAN	6/2/2021	0.70	Review data and revise damages calculations
KAN	6/7/2021	0.40	Review damages calculations with Elkin; revise damages calculations
KAN	6/9/2021	0.30	Review damages calculations with DeBoard
KAN	6/18/2021	3.20	Review damages calculations and prepare for mediation; participate in mediation
KAN	9/7/2021	0.60	Review discovery received from Defendant
KAN	9/8/2021	0.80	Review data with DeBoard and prepare summary email
KAN	9/15/2021	1.20	Review data with DeBoard; discuss with DeBoard and Elkin
KAN	9/16/2021	1.20	Review damages calculations and revise and summarize for email to Elkin
KAN	10/18/2021	1.10	Review data and summarize for Elkin for call with Defendant
KAN	1/27/2022	0.50	Review deposition preparation materials and respond with summary to Elkin
KAN	1/28/2022	1.10	Review discovery production for pay data and summarize contents and revise deposition draft
KAN	12/16/2022	1.10	Review damages calculations and discuss with RED, MAE, and SMB; discuss case with expert Lanier
KAN	2/8/2023	1.20	Review information from Defendant and prepare summary on Class Notice List
KAN	3/10/2023	0.30	Review data from Defendant and prepare summary email for MAE



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
KAN	3/13/2023	0.90	Review data and discuss damages calculation methodologies with RED
KAN	3/14/2023	1.10	Review data and discuss with RED; prepare summary email
KAN	3/16/2023	0.80	Review damages calculations and discuss with RED
KAN	3/17/2023	2.70	Prepare damages calculations and discuss with RED; prepare summary email
KAN	3/20/2023	0.80	Meet with RED to revise damages calculations
KAN	3/23/2023	3.30	Review data on sick leave usage; prepare analysis and summary email
KAN	3/24/2023	1.40	Review data and prepare analysis on damages calculations; discuss with MAE
KAN	4/10/2023	1.30	Meet with Hedgpeth, MAE and RED to discuss damages calculations and mediation preparation
KAN	4/11/2023	2.80	Review data and damages calculations with MAE, RED, SMB and Hedgpeth; review and prepare damages calculations for mediation
KAN	4/12/2023	0.80	Review data and damages calculations; review and edit draft mediation letter
KAN	4/14/2023	0.30	Review draft letter submission for Defendant
KAN	4/25/2023	0.80	Review calculations with RED in preparation for meeting with plaintiff; meet with plaintiff, MAE and SMB
KAN	4/26/2023	1.10	Review damages calculations and discuss with RED; prepare research for mediation per MAE; discuss with MAE
KAN	4/27/2023	3.20	Review data and revise damages calculations; participate in mediation with MAE
KAN	5/3/2023	0.30	Discuss case status and strategy with MAE and discuss information with RED



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
KAN	5/22/2023	1.20	Review data from Defendant and prepare plaintiff cross-check
KAN	5/23/2023	1.80	Review information with RED related to distribution amounts for each individual; discuss with MAE and RED
KAN	5/25/2023	0.40	Review and finalize damages calculations with RED; draft summary email for MAE
KAN	5/31/2023	0.40	Review damages calculations and prepare summary amounts based on settlement information for brief
KAN	6/5/2023	6.50	Settlement discussion with MAE and RED
KAN	7/12/2023	0.80	Review information provided by Defendant and prepare information for claims administrator; discuss with MAE
KAN	7/13/2023	0.20	Review data and discuss with MAE
KAN	8/7/2023	0.40	Review data and information from MAE on dispute issue; prepare summary email
KAN	9/20/2023	0.30	Review data and discuss with MAE; prepare calculation of potential amounts owed
KD	2/18/2021	0.20	Update docket
KD	2/19/2021	0.10	Update docket
KD	2/22/2021	0.30	Prepare Cogs, call clerk's office; file motion for PHV
KD	2/23/2021	0.10	Update docket
KD	3/17/2021	0.10	Save latest case filings
KD	3/22/2021	0.20	Save latest filings
KD	3/23/2021	0.10	Save latest filing
KD	4/13/2021	0.10	Review latest filing
KD	4/21/2021	0.20	Review latest filing
KD	5/14/2021	0.10	Correspondence with MTO regarding latest docket entries



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Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
KD	5/17/2021	0.70	Call with MAE regarding redaction project; compile folder; begin redacting
KD	5/18/2021	0.10	Review and organize latest filing
KD	5/19/2021	1.00	Correspondence with team; make redactions to emails and compile into one document; add bates stamp
KD	6/15/2021	0.40	Review MAE correspondence regarding document compilation; compile documents
KD	10/19/2021	0.20	Discuss defendant produced data with MAE
KD	10/20/2021	0.40	Draft job listing chart
KD	10/21/2021	0.70	Finish compiling job listing chart, send to MAE
KD	4/7/2022	0.10	Review correspondence re: deposition invoices
KD	3/29/2023	0.20	Correspondence re: Mediation Agreement; create and send DocuSign request for agreement
KD	4/5/2023	0.10	Send signed agreement to team
KD	4/26/2023	0.20	Research company reviews with KAN
KD	6/6/2023	0.60	Discuss with MAE the agreement logistics
KD	6/8/2023	0.60	Call with MAE to discuss corrections needed; send out new agreement R
KD	6/12/2023	0.50	Correspondence with MAE re: agreement signatures; organize docket naming system
KD	6/13/2023	0.20	Correspondence with MAE re: agreement signature status
KD	6/16/2023	0.80	Correspondence with MAE re: settlement agreement signature status
KD	8/21/2023	0.20	Correspondence with team re: non plaintiff email
KD	8/22/2023	0.10	Review MAE correspondence with non-plaintiff
KD	8/23/2023	0.30	Review MAE correspondence with non-plaintiff
KD	8/29/2023	0.20	Correspondence with team re: potential class member



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Miscellaneous

Matrix

Report Period: 2/16/2021 to 10/5/2023

TIMEKEEPER	DATE	HOURS	DESCRIPTION
KD	8/30/2023	0.10	Review MAE correspondence with opposing counsel
KD	9/18/2023	0.40	Correspondence with team re: email from eligible participant; reply to email
KD	9/21/2023	0.10	Review correspondence re: class member status

McGillivray Steele Elkin LLP
Expenses Incurred
Report Period: 2/18/2021 to 9/30/2023

Miscellaneous
Matrix

Bloomberg, Lexis, Westlaw Research	\$1,837.21
Consultant Services	\$5,264.90
Copies @ 12 cents each	\$75.24
Court Costs	\$200.00
Filing Fee	\$402.00
Mediation Fee	\$2,731.40
Pacer	\$22.60
Travel Expenses	\$2,294.26
Transcripts	\$4,696.70
	<hr/>
	\$17,524.31

EXHIBIT B

The Hedgpeth Law Firm PC

Matrix

Travis Hedgpeth

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2021	620	27.60	\$17,112.00
2022	620	138.40	\$85,808.00
2023	620	32.50	\$20,150.00
			Sub Total: \$123,070.00

Expenses

Mediator	\$2,500.00
Pro Hac Vice	\$200.00
Travel Expenses for Mediation	\$2,746.92
Sub Total: \$5,446.92	

Grand Total: \$128,516.92

The Hedgpeth Law Firm PC

Matrix

Timekeeper	Date	Narrative	Time
T. Hedgpeth	2/7/2021	Review and provide comments to	1.80
T. Hedgpeth	2/12/2021	TC with JLS regarding co-counsel.	0.50
T. Hedgpeth	2/19/2021	Email to OPC regarding service.	0.20
T. Hedgpeth	3/5/2021	Review documents provided by Ms. Heckle, including emails from March-November 2020; telephone conference	2.30
T. Hedgpeth	3/11/2021	TC with OPC regarding case and answer deadline.	0.50
T. Hedgpeth	3/11/2021	Email to CC regarding discussion with	0.20
T. Hedgpeth	4/20/2021	Email to OPC regarding mediation.	0.20
T. Hedgpeth	4/23/2021	Prepare for and participate in call with OPC regarding mediation.	1.50
T. Hedgpeth	4/29/2021	Review Notice of Withdrawal.	0.10
T. Hedgpeth	5/3/2021	TC with JLS regarding mediation.	0.80
T. Hedgpeth	5/3/2021	Review caselaw regarding first-to-file	0.80
T. Hedgpeth	5/3/2021	Review letter to OPC regarding deferring mediation.	0.40
T. Hedgpeth	5/11/2021	Review OPC email and comments to letter to Court.	0.20
T. Hedgpeth	5/24/2021	Review job description and pay data produced by defendant.	1.00
T. Hedgpeth	5/28/2021	Prepare for and attend pre-mediation conference with mediator.	1.80
T. Hedgpeth	5/28/2021	Review damage model.	1.30
T. Hedgpeth	6/1/2021	Review summary of caselaw regarding mooted of claims in connection with Rule	0.80
T. Hedgpeth	6/8/2021	TC with JLS regarding mediation.	0.50
T. Hedgpeth	6/8/2021	Review JLS email regarding mediation.	0.10
T. Hedgpeth	6/14/2021	Review and revise mediation statement.	1.50
T. Hedgpeth	6/20/2021	Prepare for mediation.	1.30
T. Hedgpeth	6/21/2021	Prepare for and attend mediation.	2.20
T. Hedgpeth	6/25/2021	Review and provide comments to case management plan.	0.70
T. Hedgpeth	7/23/2021	Review and provide comments to discovery requests.	2.20
T. Hedgpeth	8/19/2021	Emails regarding discovery requests.	0.10
T. Hedgpeth	9/2/2021	Review and provide comments to protective order.	1.20

T. Hedgpeth	9/17/2021	Review and revise 30(b)(6) notice.	1.30
T. Hedgpeth	10/1/2021	Review and revise discovery deficiency	0.70
T. Hedgpeth	10/1/2021	TC with SWT regarding discovery	0.50
T. Hedgpeth	10/19/2021	Review email regarding discovery issues.	0.20
T. Hedgpeth	10/22/2021	Review and revise letter to Court regarding discovery.	0.40
T. Hedgpeth	11/17/2021	Review letter to defendant regarding	0.30
T. Hedgpeth	1/18/2022	Perform research and review caselaw regarding administrative exemption	3.70
T. Hedgpeth	1/18/2022	Draft summary of research findings.	1.10
T. Hedgpeth	1/19/2022	Preparation and call with CC regarding	1.70
T. Hedgpeth	1/21/2022	Call with client.	1.80
T. Hedgpeth	1/28/2022	Emails with OPC regarding 30(b)(6) scheduling issues.	0.20
T. Hedgpeth	2/2/2022	Prepare outlines for 30(b)(6)	4.50
T. Hedgpeth	2/3/2022	Continue preparation for 30(b)(6)	6.20
T. Hedgpeth	2/7/2022	Prepare for 30(b)(6)	7.00
T. Hedgpeth	2/8/2022	Prepare for and take 30(b)(6)	10.00
T. Hedgpeth	2/9/2022	Prepare for and take 30(b)(6)	8.50
T. Hedgpeth	2/16/2022	Review Elisa Tavares deposition	0.80
T. Hedgpeth	2/17/2022	Review Pamela Mehiel deposition	1.10
T. Hedgpeth	3/6/2022	Begin drafting motion for class	4.20
T. Hedgpeth	3/7/2022	Continue motion for class certification	6.60
T. Hedgpeth	3/8/2022	Continue motion for class certification	6.20
T. Hedgpeth	3/8/2022	Email to OPC regarding settlement.	0.20
T. Hedgpeth	3/8/2022	TC with OPC regarding possible	0.50
T. Hedgpeth	3/8/2022	Follow-up email to OPC regarding	0.20
T. Hedgpeth	3/9/2022	TC with JLS regarding class certification	0.70
T. Hedgpeth	3/9/2022	Review declaration for class certification motion	0.20
T. Hedgpeth	3/9/2022	Emails with OPC regarding extension.	0.10
T. Hedgpeth	3/9/2022	Motion for class certification	8.20
T. Hedgpeth	3/10/2022	Prepare letter motion to Court regarding extension.	0.50
T. Hedgpeth	3/15/2022	TC with CC regarding class certification	0.40
T. Hedgpeth	3/15/2022	Revise class certification motion.	6.50
T. Hedgpeth	3/16/2022	Revise class certification motion.	7.20
T. Hedgpeth	3/17/2022	TC with OPC regarding settlement.	0.40
T. Hedgpeth	3/17/2022	TC with CC regarding settlement	0.40
T. Hedgpeth	3/19/2022	Prepare plaintiff declaration for class certification motion.	1.80
T. Hedgpeth	3/19/2022	Email to CC regarding procedural history section of class certification motion.	0.10
T. Hedgpeth	3/19/2022	Email to CC regarding discipline files.	0.10

T. Hedgpeth	3/20/2022	Email to CC regarding declaration and class certification motion.	0.50
T. Hedgpeth	3/20/2022	Revise class certification motion.	5.60
T. Hedgpeth	3/21/2022	Revise class certification motion.	7.50
T. Hedgpeth	3/22/2022	Email to OPC regarding settlement	0.30
T. Hedgpeth	4/5/2022	Email to CC regarding defendant	0.10
T. Hedgpeth	4/5/2022	Review caselaw regarding striking	2.20
T. Hedgpeth	4/6/2022	Email from OPC regarding deposition.	0.10
T. Hedgpeth	4/18/2022	Email and TC with OPC regarding opposed extension request.	0.40
T. Hedgpeth	4/19/2022	Email to OPC regarding opposed extension request.	0.20
T. Hedgpeth	4/19/2022	TC with CC regarding defendant's extension request.	0.20
T. Hedgpeth	5/11/2022	Revise Joint Motion for Discovery Dispute Resolution.	1.00
T. Hedgpeth	5/23/2022	TC with CC regarding reply for class certification motion.	0.30
T. Hedgpeth	5/25/2022	Review defendant's class certification declarations; perform research to determine whether declarations should	2.50
T. Hedgpeth	5/25/2022	Email to CC regarding striking	0.20
T. Hedgpeth	6/2/2022	Email to OPC regarding extension.	0.10
T. Hedgpeth	6/2/2022	Prepare extension letter motion.	0.30
T. Hedgpeth	6/2/2022	Class certification reply brief.	2.80
T. Hedgpeth	6/8/2022	Class certification reply brief.	4.20
T. Hedgpeth	6/16/2022	Class certification reply brief.	2.50
T. Hedgpeth	6/18/2022	Class certification reply brief.	0.80
T. Hedgpeth	6/19/2022	Review Defendant's class certification response deposition citations, compare with cited testimony, pull all inaccurate	3.20
T. Hedgpeth	6/20/2022	Continue class certification reply brief; prepare exhibit for same.	4.30
T. Hedgpeth	6/21/2022	Class certification reply brief.	3.20
T. Hedgpeth	6/21/2022	Review and revise class certification reply	4.00
T. Hedgpeth	6/22/2022	Review and revise letter to Court regarding missing exhibits.	0.20
T. Hedgpeth	12/14/2022	Review Order granting class certification	0.60
T. Hedgpeth	1/19/2023	Review and revise class notice.	0.20
T. Hedgpeth	1/20/2023	Review and revise letter to Court regarding class notice and merits	0.30
T. Hedgpeth	1/24/2023	Review letter to Court regarding adjourning conference	0.10
T. Hedgpeth	1/24/2023	TC with OPC regarding settlement; TC with cc regarding same.	1.90

T. Hedgpeth	3/11/2023	TC with CC regarding possible settlement	0.40
T. Hedgpeth	3/20/2023	Review details regarding damage model.	0.30
T. Hedgpeth	3/24/2023	Review email from Molly regarding salary issues; review damage model in connection with same.	0.50
T. Hedgpeth	4/6/2023	Review intermittent leave data provided by Defendants in advance of mediation	0.70
T. Hedgpeth	4/11/2023	Review mediation letter; emails with cc regarding same.	1.00
T. Hedgpeth	4/13/2023	Review and revise letter to OPC regarding settlement.	0.90
T. Hedgpeth	4/26/2023	Review case file and prepare for mediation in NY.	6.50
T. Hedgpeth	4/26/2023	Prepare for mediation.	1.20
T. Hedgpeth	4/27/2023	Prepare for and attend mediation.	10.00
T. Hedgpeth	4/28/2023	Review mediation notes; review term sheet; determine next steps and	7.00
T. Hedgpeth	6/9/2023	Review and edit motion for preliminary approval	1.50
Total Hours:			198.50

EXHIBIT C



Siegel Law Group PLLC
Matrix

Jack Siegel "JLS"

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2021	620	32.90	\$20,398.00
2022	620	8.40	\$5,208.00

Sub Total: \$25,606.00

Stacy Thomsen "SWT"

<u>Year</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Amount</u>
2021	410	11.90	\$4,879.00
2022	410	6.10	\$2,501.00

Sub Total: \$7,380.00

Total: \$32,986.00

Costs

Pro Hac Apps	\$400.00
Mediation Travel Costs	\$1,882.42

Total: \$2,282.42

Grand Total: \$35,268.42



Siegel Law Group PLLC

Matrix

JLS	2/1/2021	Call with SWT regarding case in New York	0.5
JLS	2/1/2021	FU Call with PC	0.8
JLS	2/5/2021	Analysis of pulled job descriptions to determine potential liability of defendnt under the administrative and professional exemption based on job duties and credentials in the job descriptions; and how to define class	3.1
JLS	2/5/2021	Research regarding claims examiner cases in Second Circuit	4.3
JLS	2/5/2021	Research regarding entity information for complaint; and checking dockets for overlapping suits	1.5
JLS	2/7/2021	Drafting Original Complaint and Submitting to TMH/SWT for review	1.8
JLS	2/8/2021	Call with SWT re email from client re concerns/escalation re alignment plan	0.6
JLS	3/12/2021	Review of Co-Counsel Agreement	0.4
JLS	3/13/2022	Research for Rule 23 Motion - Second Circuit Specific	4.2
JLS	3/14/2022	Review and edit draft of Rule 23 Motion for Class Certification	8.4
JLS	4/12/2021	Review of Answer to Complaint and Charting with Complaint to identify admissions	1.4
JLS	4/20/2021	Affidavit, Motion and Proposed Order for Pro Hac Vice	1.2
JLS	5/2/2021	Research regarding motions to compel arbitration and first-to-file rule; judge specific and circuit specific research; emailing co-counsel same	4.4
JLS	6/25/2021	Review of Case Management Plan	0.3
			32.9

JLS	2/7/2022	Research regarding insurance adjuster licensure in New York and case law interpreting same to invalidate argument that our folks worked as insurance claims adjusters under insurance adjuster example in regs	4.8
JLS	2/7/2022	Collecting research regarding insurance adjuster licensure; organizing, and sending to co-counsel	0.8
JLS	4/4/2022	Talk with TMH regarding motion to strike; and whether it should be filed separately from reply	1.6
JLS	4/4/2022	Research regarding whether we should file a motion to strike separately or along with our reply in support of motion for class certification	1.2
			8.4
SWT	1/25/2021	Call with PC re case	0.6
SWT	1/31/2021	Call with PC and memo to file re same	1.4
SWT	2/1/2021	Call with JLS regarding case in New York	0.5
SWT	2/1/2021	FU Call with PC	0.8
SWT	2/7/2021	Review of client email re concerns/escalations re alignment plan	0.4
SWT	2/7/2021	Review and notes re all documents sent by client	1.8
SWT	2/8/2021	Edits to JLS Original Complaint	1.2
SWT	2/8/2021	Call with JLS re email from client re concerns/escalation re alignment plan	0.6
SWT	3/17/2021	Motion, Affidavit, and Proposed Order for Pro Hac Vice Motion	1.1
SWT	3/22/2021	Corrected Pro hac Vice Motion	0.5
SWT	4/13/2021	Review of D answer	0.4
SWT	5/4/2021	Review of letter to court regarding mediation referral for edits and corrections	0.3
SWT	9/13/2021	Review and edits to client's discovery responses	1.3
SWT	10/1/2021	Review of Matrix discovery letter and sending edits to co-counsel	1
			11.9

SWT	3/21/2022	Review of declaration and sending to client for signature for Motion for Class certificaion	0.6
SWT	3/21/2022	Review and edits to motion for class certification, including adding TOC/TOA	2.8
SWT	5/11/2022	Review and edits to Joint Motion for Discovery Issues,	1.5
SWT	5/11/2022	Creation of spreadsheet for Joint Motion for Discovery Issues	1.2
			6.1